



DISABILITY AND COMMUNICATION ACCESS BOARD

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INTERPRETIVE OPINION

Pursuant to §103-50, Hawaii Revised Statutes (HRS), all buildings and facilities constructed by, or on behalf of the State or any county, shall conform to the 2004 Americans with Disabilities Act Accessibility Guidelines (2004 ADAAG) and amendments. In accordance to HRS §103-50 and Chapter 11-217, Hawaii Administrative Rules, the Disability and Communication Access Board has authority to issue interpretive opinions to HRS §103-50 design standards.

Docket: DCAB 2011-06: Areas designed for boat wash down typically consist of two hose bibs with an adjacent space to park the boat temporarily, while it is being washed. Is a boat wash down area required to be accessible? If a boat wash down area is required to be accessible, what are the scoping and technical requirements?

Summary: The 2004 ADAAG does not address boat wash down areas. Most boating facilities provide a boat wash down area that consists of an area to pull up and park your boat with two hose bibs. The area is used to wash off salt and debris and to flush out a boat's engine after use. The area may be paved but in some locations, the area can also be an unpaved area just hose bibs.

Where elements are provided for the use of the general public and there is not a scoping requirement, at least one is required to be accessible. The hose bib or fixed/built-in controls are covered by the ADAAG's provisions for operating mechanisms. The question appears to be one of what is required of the pull-up area itself. It does not appear to be reasonable to assume that the hose bib is required to be accessible yet the pull-up space is not accessible and that there is no accessible route from the vehicle to the hose bib. As someone must drive their vehicle to the wash down area and exit the vehicle, the wash down area appears to function as either a parking space or a passenger loading area. The intent or function of the area is similar to that of a passenger loading area rather than a parking stall. A person will drive up, park, exit their vehicle to use the hose bib and then get back into their vehicle and leave. They will not leave their vehicle there unattended for a period of time like a parking space. It should comply with the technical provisions of a passenger loading area; this would allow someone to exit their vehicle and provide an accessible route to the hose bib.

There is no guideline that appear to be applicable to the boat/trailer or to determine the minimum size of the trailer/boat area. Where no guidelines exist, best practice is recommended. It can be argued that boats and boat trailers are recreational vehicles. The Access Board's Draft Final Outdoor Accessibility Guidelines provides technical requirements for the size of recreational vehicle parking and pull-up spaces. The requirements do not require a separate access aisle. The widths specified, are as wide as a single-vehicle stall and access aisle combined. Similar to parking stalls in the ADAAG, the Access Board guidelines do not address the lengths of parking stalls and pull up spaces as that may vary and is typically regulated by the local building authority.

Ruling: For buildings or facilities subject to HRS §103-50,

ADAAG Section 209 Passenger Loading Zones and Bus Stops

Where boat wash down areas are provided, at least one vehicle pull-up space shall be accessible and comply with ADAAG Section 503 Passenger Loading Zones. The vehicle pull-up space shall connect to the fixed or built-in hose bib or wash down equipment by an accessible route complying with ADAAG Section 403 Walking Surfaces. The fixed or built-in hose bib or wash down equipment shall comply with ADAAG 309 Operable Parts.

It is recommended that the trailer portion of the pull up area comply with the following:

- (1) The minimum width should be 16 feet
- (2) The minimum length of the combined vehicle/trailer pull-up space should be 40 feet.
- (3) The surface should be firm and stable.
- (4) The slope should not be steeper than 1:48 in any direction
***EXCEPTION:** When the surface is other than asphalt, concrete, or boards, slopes not steeper than 1:33 shall be permitted where necessary for drainage.*
- (5) An accessible route should connect the combined vehicle/trailer pull-up space to the other accessible elements on the site

[Rul: 01/03/2011)] (Auth and Imp: HRS §103-50)

If you have any questions or comments regarding this ruling, please call us at 586-8121.
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